

EXHIBIT 1

Miller | Schirger_{LLC}



**Nationwide representation of plaintiffs and defendants
in complex legal disputes.**

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FIRM OVERVIEW

Miller Schirger is a Kansas City, Missouri-based law firm focused on resolving complex disputes on behalf of businesses and individuals nationwide. Information regarding the firm, the scope of its practice, and its honors is available at www.millerschirger.com. Below is a partial listing of the firm's experience in plaintiff-side class actions. The firm has also obtained significant results in a wide range of lawsuits representing individual plaintiffs and defendants.

CLASS ACTIONS

- Appointed and currently serving as class counsel to a certified nationwide class of life insurance policy owners in a class action against USAA Life Insurance Co. asserting claims for breach of contract resulting in alleged policy overcharges. *Spegele v. USAA Life Insurance Co.*, No. 5:17-CV-00967-OLG (W.D. Tex.).
- Appointed and currently serving as class counsel to a certified class of California life insurance policy owners in a class action against State Farm asserting claims for, among other things, breach of contract resulting in alleged life insurance policy overcharges, including "cost of insurance" overcharges. *Bally v. State Farm Life Ins. Co.*, 335 F.R.D. 288 (N.D. Cal. 2020).
- After two hours of deliberations, on June 6, 2018, a federal jury in Missouri awarded \$34.3 million to State Farm policyholders in a class action trial. The class action was brought on behalf of approximately 24,000 current and former owners of universal life insurance policies issued in Missouri. Universal life insurance is a type of life insurance that includes an interest-bearing savings account from which the insurer deducts money each month to cover the cost of the life insurance. The jury found that State Farm systematically overcharged its policyholders for 23 years. *Vogt v. State Farm Life Insurance Co.*, No. 2:16-cv-04170-NKL, (W.D. Mo.). The case was affirmed on appeal. *Vogt v. State Farm Life Insurance Co.*, 963 F.3d 753 (8th Cir. 2020).
- Settled a nationwide class action lawsuit against John Hancock Life Insurance Company (U.S.A.) over alleged life insurance policy overcharges. The settlement was approved by the court in May 2018 and provided that John Hancock pay \$59.75 million (less fees and expenses) in cash compensation to approximately 103,000 policyholders who own or owned a Flex V-II variable whole life insurance policy sold and administered by John Hancock over the last several decades. *Larson v. John Hancock Life Ins. Co.*, Case No. RG16 813803 (Superior Court of California, County of Alameda).
- Represented plaintiff class of policyholders in nationwide class action against The Lincoln National Life Insurance Company alleging life insurance policy overcharges including "cost of insurance" overcharges. Lincoln National agreed to settle the case by, among other things, issuing term life insurance certificates to a settlement class consisting of approximately 77,000 policy owners across 30 states. The term life insurance certificates have a total face amount of death benefits estimated at \$2.25 billion, with a market value of approximately \$171.8 million. *Bezich v. The Lincoln Nat. Life Ins. Co.*, No. 02C01-0906-PL-73 (Allen Co, IN).
- Represented plaintiff in alleged class action involving cost of insurance overcharges in life insurance policies. Case of first impression holding Class Action Fairness Act's (CAFA) securities exception allowed

alleged class action involving variable life insurance policy to proceed forward in state court; case was not subject to removal to federal court. *Lincoln Nat'l. Life Ins. Co. v. Bezich*, 610 F.3d 448 (7th Cir. 2010).

- Represented plaintiff in alleged class action involving cost of insurance overcharges in life insurance policies. Securities Litigation Uniform Standards Act (SLUSA) did not preclude plaintiff's claim for breach of contract even though such claim was related to the purchase or sale of a covered security under SLUSA. *Freeman Investments, L.P. v. Pac. Life Ins. Co.*, 704 F.3d 1110 (9th Cir. 2013).

PLAINTIFF RESULTS

- \$59.75 million nationwide settlement in life insurance class action
- \$34.3 million verdict to Missouri life insurance policyholders
- \$2.25 billion nationwide class action settlement
- \$116 million verdict for general contractor in bad faith claim against surety
- Substantial recovery for institutional investor from mortgage-backed securities broker
- Groundbreaking class-action decision against Fortune 500 life insurance company
- \$4.3 million settlement of highway construction case
- \$4.9 million verdict in water utility case
- \$11.4 million case involving development rights resolved in client's favor during trial
- \$4 million professional malpractice claims settled in trustee's favor
- Antitrust claim settled on behalf of client
- Judgment for injunction relief and damages obtained in unfair competition and fraud case
- Wrongful death settlement in product liability case

DEFENSE RESULTS

- \$1.2 billion whistleblower claim dismissed on summary judgment
- \$100 million in claims successfully resolved for broker/dealer
- NY investment bank pays nothing in settlement of unfair competition claim
- Win for IBM in \$8.5 million alleged fraud case
- Multi-billion dollar product liability exposure resolved to client's satisfaction

- \$7 million claim against propane company defeated at trial
- Intellectual property claim resolved for manufacturer
- \$12 million workout for commercial borrower
- \$30 million environmental mass tort claims against Beatrice dismissed on summary judgment

TRIAL FIRM

EXPERIENCED

We have a proven track record of success representing plaintiffs and defendants in state and federal trial and appellate courts, before administrative and regulatory tribunals and in arbitration and other alternative dispute resolution proceedings nationwide.

PRACTICAL

From the beginning of an engagement, we seek to truly understand your business in order to provide strategic counsel and insightful guidance tailored to your objectives.

FOCUSED ON RESULTS

We measure success not by the hours billed, but by the results obtained for our clients. Although we are skilled trial lawyers who prepare each case as though it will go to trial, we never stop seeking the most efficient, cost-effective strategy for obtaining results.

Firm members who make up the trial team on plaintiff-side class actions are identified below.



John J. Schirger

For over 25 years John has represented businesses and individuals nationwide in disputes concerning breach of contract, fraud, business torts, consumer protection, insurance and reinsurance, securities and commodities, whistle-blower claims, and environmental matters. He also has significant experience in personal injury and wrongful death cases. John has successfully handled cases in federal or state courts in over 20 states, has argued before federal and state appellate courts, and has represented parties in AAA and Financial Industry Regulatory Authority (FINRA) arbitrations.

John began his career at a large regional law firm where he was elected partner after four years of practice. After only five years of practice, he obtained an "AV" rating from law publisher Martindale-Hubbell, the highest rating a lawyer can receive for competence and ethics. John has been named a "Top 100 Missouri & Kansas Super Lawyer" and "Best of the Bar" by the Kansas City Business Journal.

John represents clients in a wide variety of cases involving business and commercial disputes, securities litigation matters, and class actions. In these cases, his clients include business owners, individuals and family members, investors including community banks and hedge funds, and members of the Forbes 400. John is known for his disciplined and thorough approach in cases, but also for being practical and creative in resolving disputes.

AREAS OF PRACTICE

- Banking Litigation
- Commercial Litigation
- Class-Action Lawsuits
- Construction Law
- Construction Litigation
- Fiduciary Litigation
- Insurance Litigation
- Mass Torts Litigation
- Personal Injury & Wrongful Death Litigation
- Products Liability Litigation
- Real Estate Litigation
- Securities Litigation
- Antitrust, Unfair Competition and Deceptive Trade Practices Litigation
- Whistleblower Litigation

BAR ADMISSIONS

- Missouri
- Nebraska (inactive)
- U.S. District Court District of Nebraska
- U.S. District Court Northern District of Illinois
- U.S. District Court District of Colorado
- U.S. District Court District of Kansas
- U.S. District Court Western District of Missouri
- U.S. District Court Eastern District of Wisconsin
- U.S. Court of Appeals 1st Circuit
- U.S. Court of Appeals 3rd Circuit
- U.S. Court of Appeals 7th Circuit
- U.S. Court of Appeals 8th Circuit
- U.S. Court of Appeals 9th Circuit
- U.S. Court of Appeals 10th Circuit

EDUCATION

- **Creighton University School of Law**
 - Juris Doctor - 1992
- **University of Notre Dame**
 - Bachelor of Arts - 1988

HONORS & AWARDS

- *The National Law Journal's* Top 100 Verdicts 2018
- Missouri Lawyers Awards – Top 5 Verdict in 2018
- Multi-Million Dollar Advocates Forum – Top Trial Lawyers in America
- Best of the Bar – Kansas City Business Journal
- Martindale Hubbell – AV Highest Rating
- SuperLawyers – SuperLawyer Magazine
- Fellow – American Bar Foundation

PROFESSIONAL ASSOCIATIONS & MEMBERSHIPS

- American Bar Association
 - Section on Tort Trial and Insurance Practice
 - Section on Litigation
- Missouri Bar Association
- Kansas City Metropolitan Bar Association
 - Civil Litigation Section
 - Business Litigation Committee (Former Chair)
- Missouri Association of Trial Attorneys
- Nebraska Bar Association
- American Association for Justice
 - Section on Business Torts
 - Section on Insurance Law

- Section on Product Liability

REPRESENTATIVE CASES

Business Litigation — Represented plaintiff in action on a guaranty related to a securities purchase. Defeated defendant's attempt to force the case to arbitration; affirmed on appeal.

Business Litigation – Represented defendant in alleged internet fraud case where plaintiff claimed \$2.5 million in damages; favorable settlement reached for client shortly before trial.

Business Litigation – Represented defendant majority owner in minority shareholder dispute where plaintiff claimed \$1.5 million in damages; case dismissed in favor of defendant after full evidentiary hearing and plaintiff elected not to appeal.

Business Litigation – *American Shizuki Corp. v. International Business Machines*, Represented defendant IBM in alleged fraud case where plaintiff claimed \$8.5 million in damages; summary judgment granted in favor of defendant on all counts and affirmed by the Eighth Circuit. (8th Cir. 2001)

Mass Torts (Environmental) Litigation – *Truck Components, Inc., et al. v. Beatrice Company, Inc. et al.*, Represented defendant Beatrice Company in complex environmental case where plaintiff claimed \$30 million in damages in connection with acquisition and divestiture of a foundry plant; summary judgment granted in favor of defendant on all counts and affirmed by Seventh Circuit. (7th Cir. 1998)

Construction Litigation – Represented defendant steel contractor in lawsuit involving the construction of a power plant; defeated 90% of plaintiff's claims and damages in week-long arbitration.

Construction Litigation – Represented plaintiff underground utility contractor in complex lien foreclosure lawsuit resulting in settlement the morning of trial where plaintiff received 100% of monies claimed.

Construction Litigation – Represented general contractor in dispute with surety concerning the construction of a food processing facility; favorable settlement reached for client without initiating lawsuit.

Cost of Insurance Class Action – *Vogt v. State Farm Life Insurance Company*, Represented plaintiff Missouri class of policyholders in class action trial involving cost of insurance overcharges in life insurance policies. Jury awarded policyholder class \$34.3 million and determined that State Farm had systematically overcharged policyholder class (Western District of Missouri, Central Division 2018); affirmed on appeal. (8th Cir. 2020)

Cost of Insurance Class Action – *Larson v. John Hancock Life Insurance Company (U.S.A.)*, Represented plaintiff class of policyholders in nationwide class action involving cost of insurance overcharges in life insurance policies. John Hancock agreed to settle the case for \$59.75 million that will be distributed to approximately 103,000 policyholders. (Superior Court of California, County of Alameda, Oakland, CA 2018)

Cost of Insurance Class Action — *Bezich v. Lincoln Nat'l. Life Ins. Co.*, Represented plaintiff class of policyholders in nationwide class action against The Lincoln National Life Insurance Company alleging life

insurance policy overcharges including “cost of insurance” overcharges. Lincoln National agreed to settle the case by, among other things, issuing term life insurance certificates to a settlement class consisting of approximately 77,000 policy owners across 30 states. The term life insurance certificates have a total face amount of death benefits estimated at \$2.25 billion, with a market value of approximately \$171.8 million. (Allen County Circuit Court, Fort Wayne, IN 2016)

Cost of Insurance Class Action - Bezich v. Lincoln Nat'l. Life Ins. Co., Represented plaintiff in alleged class action involving cost of insurance overcharges in life insurance policies. Case of first impression holding Class Action Fairness Act's (CAFA) securities exception allowed alleged class action involving variable life insurance policy to proceed forward in state court; case was not subject to removal to federal court. (7th Cir. 2010)

Cost of Insurance Class Action – Freeman Investments, L.P. v. Pac. Life Ins. Co., Represented plaintiff in alleged class action involving cost of insurance overcharges in life insurance policies. Securities Litigation Uniform Standards Act (SLUSA) did not preclude plaintiff's claim for breach of contract even though such claim was related to the purchase or sale of a covered security under SLUSA (9th Cir. 2013)

Employment Law and Litigation – Represented defendant manufacturer in dispute with former employee. Summary judgment entered in favor of defendant on all counts. Plaintiff elected not to proceed with an appeal.

Insurance Litigation – Represented plaintiff property-owner in direct action against property-casualty insurer involving risk of loss provision in purchase and sale agreement. Case settled through mediation shortly before trial where plaintiff recovered 125% of specified damages.

Mass Torts Litigation – Represented defendants nationwide in lead paint products liability cases; cases resolved through successful summary judgment practice or mediation.

Personal Injury and Wrongful Death Litigation – Represented widower and young children in personal injury and wrongful death case; obtained maximum recovery for clients under various insurance policies without initiating a lawsuit.

Products Liability Litigation – Represented plaintiff widow and family members in wrongful death case of husband/father involving a defective consumer product. Confidential settlement reached after minimal discovery.

Real Estate Litigation – Represented defendant owner/landlord in complex dispute with tenant; favorable settlement reached for client after successful trial.

Securities Litigation – Represented plaintiff Colorado Bank in dispute with its broker-dealer involving the marketing and sale of mortgage-backed securities. Confidential settlement reached for client resulting in substantial recovery. Within two weeks of finalizing the settlement, regulatory officials substantially upgraded the Bank's rating.

Securities Litigation – Represented plaintiff Texas bank in dispute with its broker-dealer involving the marketing and sale of mortgage-backed securities. Confidential settlement reached for client resulting in substantial recovery.

Securities Litigation – Represented individual investor in alleged ponzi scheme. Seven-figure settlement reached with broker/advisor; all invested funds were recovered for client.

Securities Litigation – Represented defendant broker/dealer in complex securities and commodities' ponzi scheme cases where plaintiffs claimed damages in excess of \$100 million; after close of discovery, favorable settlements reached for client through mediation.

Unfair Competition and Deceptive Trade Practices Litigation – Represented defendant New York investment banking firm in commercial dispute involving alleged breach of nondisclosure agreement. Successful settlement reached for client after minimal discovery; client paid no money to Plaintiff.

Whistleblower Litigation - U.S. ex rel. Bahrani v. ConAgra, Inc., Represented defendant ConAgra Foods, Inc. in alleged civil false claims case where plaintiff claimed \$1.2 billion in damages; summary judgment granted in favor of defendant on all counts. (D. Colorado 2004)

Miller | Schirger LLC

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Matthew W. Lytle

Throughout his practice, Matt has represented clients ranging from individuals to privately held and publicly traded corporations in various state and federal courts nationwide, and in arbitrations with the AAA and the Financial Industry Regulatory Authority (FINRA). Matt's experience covers all phases of the litigation process including case strategy, pre-trial briefing and motion practice, depositions and discovery, dispositive motion practice, trial preparation, trial, and appeals.

Matt's representative litigation experience includes representing both plaintiffs and defendants in disputes involving claims for fraud, breach of fiduciary duty, breach of trust, breach of contract, and civil RICO, as well as consumer class action and whistleblower claims.

In addition to litigation, Matt has experience in the area of white collar defense and investigations, and has represented clients in investigations by various federal agencies including the CFTC and the USDA.

Matt was named a "Rising Star" (2011, 2012) and a "Super Lawyer" (every year since 2013) by *Missouri & Kansas Super Lawyers*. Matt was also named to the 2012 BTI Client Service All-Stars, a select group of only 272 lawyers nationwide who are chosen solely on unprompted, unequivocal recommendations by corporate counsel for their understanding of business issues, innovative approaches to legal services, and commitment to client needs.

Matt began his legal career at a large regional law firm in Omaha, Nebraska. After moving to Kansas City, he practiced in large national and international law firms before joining Miller Schirger.

AREAS OF PRACTICE

- Banking Litigation
- Commercial Litigation
- Class-Action Lawsuits

- Fiduciary Litigation
- Insurance Litigation
- Personal Injury & Wrongful Death Litigation
- Products Liability Litigation
- Real Estate Litigation
- Securities Litigation
- Antitrust, Unfair Competition and Deceptive Trade Practices Litigation
- Whistleblower Litigation

BAR ADMISSIONS

- Missouri
- Nebraska (inactive)
- U.S. District Court Western District of Missouri
- U.S. District Court District of Nebraska
- U.S. District Court District of Kansas
- U.S. District Court District of Colorado
- U.S. District Court Eastern District of Wisconsin
- U.S. Court of Appeals 8th Circuit
- U.S. Court of Appeals 9th Circuit
- U.S. Court of Appeals 10th Circuit

EDUCATION

- **Creighton University School of Law**
 - Juris Doctor (*Magna Cum Laude*) - 2004
- **Creighton University**
 - Bachelor of Arts - 1996

HONORS & AWARDS

- *The National Law Journal's* Top 100 Verdicts 2018
- Missouri Lawyers Awards – Top 5 Verdict in 2018
- Rising Star, SuperLawyers, 2011-2012
- SuperLawyers – SuperLawyer Magazine
- BTI Client Service All-Stars, 2012
- Fellow – American Bar Foundation

PROFESSIONAL ASSOCIATIONS & MEMBERSHIPS

- American Bar Association
- Missouri Bar Association
- Kansas City Metropolitan Bar Association
- Nebraska Bar Association

REPRESENTATIVE CASES

Business Litigation — Multivac, Inc. vs. Rotella's Italian Bakery, Inc., Represented defendant / counterclaimant in case involving claims for breach of contract, and counterclaims for repudiation of contract

and breach of express and implied warranties, among others, related to the purchase of a vacuum-seal packaging machine. A four-day jury trial in the United States District Court for the Western District of Missouri, resulted in verdicts in client's favor on the plaintiff's claim for breach of contract, and the client's counterclaims for repudiation of contract and breach of express warranty.

Business Litigation – Represented plaintiff and counter-defendant propane company in protracted litigation involving claims for alleged overcharges related to vehicle refurbishing services and counterclaims against client seeking damages of \$6.97 million for alleged breach of contract and business torts. A nine day jury trial in the Circuit Court for Jackson County, Missouri, produced a favorable result for the client, including the client paying less than 10% of the counter-claim damages sought.

Cost of Insurance Class Action – Vogt v. State Farm Life Insurance Company, Represented plaintiff Missouri class of policyholders in class action trial involving cost of insurance overcharges in life insurance policies. Jury awarded policyholder class \$34.3 million and determined that State Farm had systematically overcharged policyholder class (Western District of Missouri, Central Division 2018); affirmed on appeal. (8th Cir. 2020)

Cost of Insurance Class Action – Larson v. John Hancock Life Insurance Company (U.S.A.), Represented plaintiff class of policyholders in nationwide class action involving cost of insurance overcharges in life insurance policies. John Hancock agreed to settle the case for \$59.75 million that will be distributed to approximately 103,000 policyholders. (Superior Court of California, County of Alameda, Oakland, CA 2018)

Cost of Insurance Class Action — Bezich v. Lincoln Nat'l. Life Ins. Co., Represented plaintiff class of policyholders in nationwide class action against The Lincoln National Life Insurance Company alleging life insurance policy overcharges including “cost of insurance” overcharges. Lincoln National agreed to settle the case by, among other things, issuing term life insurance certificates to a settlement class consisting of approximately 77,000 policy owners across 30 states. The term life insurance certificates have a total face amount of death benefits estimated at \$2.25 billion, with a market value of approximately \$171.8 million. (Allen County Circuit Court, Fort Wayne, IN 2016)

Cost of Insurance Class Action - Bezich v. Lincoln Nat'l. Life Ins. Co. — Represented plaintiff in alleged class action involving cost of insurance overcharges in life insurance policies. Case of first impression holding Class Action Fairness Act's (CAFA) securities exception allowed alleged class action involving variable life insurance policy to proceed forward in state court; case was not subject to removal to federal court. (7th Cir. 2010)

Cost of Insurance Class Action - Freeman Investments, L.P. v. Pac. Life Ins. Co. — Represented plaintiff in alleged class action involving cost of insurance overcharges in life insurance policies. Securities Litigation Uniform Standards Act (SLUSA) did not preclude plaintiff's claim for breach of contract even though such claim was related to the purchase or sale of a covered security under SLUSA (9th Cir. 2013)

Securities Litigation — Represented plaintiff Colorado Bank in dispute with its broker-dealer involving the marketing and sale of mortgage-backed securities. Confidential settlement reached for client resulting in

substantial recovery. Within two weeks of finalizing the settlement, regulatory officials substantially upgraded the Bank's rating.

Securities Litigation — Represented plaintiff Texas bank in dispute with its broker-dealer involving the marketing and sale of mortgage-backed securities. Confidential settlement reached for client resulting in substantial recovery.

Securities Litigation — Represented individual investor in alleged ponzi scheme. Seven-figure settlement reached with broker/advisor; all invested funds were recovered for client.



Joseph M. Feierabend

Joe focuses his practice primarily in the areas of complex business and commercial litigation. He represents businesses and individuals in state and federal courts and before arbitration panels nationwide in disputes involving breach of contract, business torts, and other commercial claims. His expertise extends to class actions, insurance coverage and bad faith claims, personal injury claims, claims asserting violations of constitutional rights, as well as counseling institutional investors in broker/dealer disputes involving complex, structured financial products and transactions. In addition, Joe has significant experience representing plaintiffs in cost-of-insurance class-action litigation in state and federal courts throughout the United States.

Joe obtained his B.B.A. degree from the University of Notre Dame where he majored in accounting and obtained his J.D. from the University of Missouri School of Law, where he focused his studies in the areas of finance and tax. Before beginning his legal career, Joe spent two years running the daily operations of a Kansas City company. His prior work experience and financial background provide a unique perspective in analyzing business disputes, and consistently prove to be a significant advantage in advising clients.

AREAS OF PRACTICE

- Banking Litigation
- Commercial Litigation
- Class-Action Lawsuits
- Constitutional Law/Civil Rights Litigation
- Construction Law
- Construction Litigation
- Insurance Litigation
- Real Estate Litigation
- Securities Litigation
- Antitrust, Unfair Competition and Deceptive Trade Practices Litigation
- Whistleblower Litigation

BAR ADMISSIONS

- Missouri
- U.S. District Court District of Colorado
- U.S. District Court Western District of Missouri
- U.S. District Court District of Kansas
- U.S. Court of Appeals 9th Circuit
- U.S. Court of Appeals 10th Circuit

EDUCATION

- **University of Missouri School of Law**
 - Juris Doctor - 2008
- **University of Notre Dame**
 - Bachelor of Business Administration - 2005

PROFESSIONAL ASSOCIATIONS & MEMBERSHIPS

- American Association for Justice
- American Bar Association
- Missouri Bar Association
- Kansas City Metropolitan Bar Association
- Missouri Association of Trial Attorneys

REPRESENTATIVE CASES

Business Litigation – Represented individual and brought action to recover on claims arising from breach of settlement agreement and non-compliance with judgment of a Missouri circuit court. A favorable settlement was reached soon after initiating enforcement proceedings with the court.

Business Litigation – Represented business in contract dispute with multinational insurance brokerage. Negotiated and obtained a settlement in client's favor, without filing a lawsuit.

Civil Rights – Represented plaintiff in a tort/civil rights action which alleged 12 claims against police, hospital and the doctors who treated plaintiff in the emergency room, the municipality emergency services personnel and the municipality which employed the individual defendants. The claims included Excessive Force, Unlawful Seizure, False Arrest, Unlawful Search, Interference With and Denial of Medical Care, Delay of Plaintiff's Release, Municipal Liability, Assault, Battery, Intentional Infliction of Emotional Distress, False Imprisonment, and Negligence, and sought relief for violation of civil rights secured by 42 § U.S.C. 1983. The defense settled with plaintiff for relief of \$11.4 million. (W.D. Missouri – Kansas City, 2018)

Cost of Insurance Class Action – Vogt v. State Farm Life Insurance Company, Represented Missouri class of policyholders in class action trial involving cost of insurance overcharges in life insurance policies. Jury determined that State Farm had systematically overcharged policyholder class and awarded \$34.3 million (Western District of Missouri, Central Division 2018); affirmed on appeal. (8th Cir. 2020)

Cost of Insurance Class Action – Larson v. John Hancock Life Insurance Company (U.S.A.), Represented class of approximately 103,000 plaintiff policyholders in nationwide class action involving cost of insurance overcharges on life insurance policies. John Hancock agreed to settle the case for \$59.75 million. (Superior Court of California, County of Alameda, Oakland, CA 2018).

Cost of Insurance Class Action – Bezich v. Lincoln Nat'l. Life Ins. Co., Represented class of policyholders in nationwide class action against The Lincoln National Life Insurance Company alleging life insurance policy overcharges including “cost of insurance” overcharges. Lincoln National agreed to settle the case by, among other things, issuing term life insurance certificates to a settlement class consisting of approximately 77,000 policy owners across 30 states. The term life insurance certificates had a total face amount of death benefits

estimated at \$2.25 billion, with a market value of approximately \$171.8 million. (Allen County Circuit Court, Fort Wayne, IN 2016).

Insurance Litigation – Represented plaintiffs in various disputes regarding defendant insurance companies' failure to pay on property loss claims. Favorable outcomes have been reached for clients soon after initiating lawsuits.

Intellectual Property Litigation – Represented plaintiff in a trademark infringement case resulting in a positive outcome ensuring protection of client's intellectual property rights into the future.

Property Rights Litigation – Represented plaintiff in dispute involving rights to use of land and alleged adverse possession, among other claims; negotiated and obtained a favorable settlement for client.

Securities Litigation – Represented plaintiff bank in dispute with its broker-dealer. The dispute involved the marketing and sale of asset-backed securities. Confidential settlement was reached for client resulting in a substantial recovery.